

FILED

NOV 17 2003

DONALD F. PHELAN
CLERK

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ 486-03-1(1)

Superior Court
Docket Number 03 - 11 - 00197-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

LITSA TSILIONIS, D.C.)

also known as

LISA TSILIONIS, D.C.)

GEORGE TSILIONIS, D.C.)

CARL LOVE, JR.)

RAJAUHN SHARRIEFF)

also known as

JESSIE HILLIARD)

also known as

JESSIE SAULS)

and)

RUDOLF HORA)

also known as

ANILHOMME MILIEN)

also known as

JOSEPH G. MOOR)

The Grand Jurors of and for the State of New Jersey,
upon their oaths, present that:

COUNT ONE

(Conspiracy - Second degree)

LITSA TSILIONIS, D.C.

GEORGE TSILIONIS, D.C.

CARL LOVE, JR.

RAJAUHN SHARRIEFF

and

RUDOLF HORA

who are named as defendants herein and other persons whose identities are known to the Grand Jurors , who are conspirators but not named as defendants herein, between on or about July 1, 1996 and on or about March 31, 1999, at the City of East Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting and facilitating the commission of the crimes of health care claims fraud and theft by deception did agree that:

- A. One or more of them would knowingly engage in conduct which would constitute the aforesaid crimes, and
- B. One or more of them would knowingly aid in the planning, solicitation and commission of said crimes, that is:
 - 1. Knowingly make, or cause to be made false, fictitious, fraudulent or misleading statements of material fact in, or knowingly did omit material

facts from, or knowingly did cause material facts to be omitted from, any records, bills, claims or other document, in writing, electronically or in any other form that a person attempted to submit, submitted, caused to be submitted or attempted to cause to be submitted for payment or reimbursement for health care services to various insurance carriers, to wit: Allstate, American National Fire, Amica Mutual, Arbella Mutual, Clarendon, CNA, Colonial Penn, Eagle, MDA, Elco, Fidelity & Guarantee, First Trenton, General Accident, Great American, GSA, Hanover, IFA, Keystone, Liberty Mutual, National Continental, NCIC, Newark Insurance Company, New Jersey Manufacturers, Ohio Casualty, Progressive, Prudential, Selective, Sentry, State Farm, USAA, and Victoria Insurance Company, contrary to the provisions of N.J.S.A. 2C:21-4.3; and

2. Purposely obtain property of another in excess of \$75,000 by deception, in violation of N.J.S.A. 20-4.

All contrary to the provisions of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Health Care Claims Fraud - Second degree)

LITSA TSILIONIS, D.C.

and

GEORGE TSILIONIS, D.C.

who were practitioners, licensed to practice Chiropractic medicine in the State of New Jersey, doing business as Allied Trauma and Health Care, Inc., between on or about January 15, 1998 and on or about March 31, 1999, at the City of East Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, while in the course of providing professional services, knowingly did commit Health Care Claims Fraud, in that the said LITSA TSILIONIS and GEORGE TSILIONIS did knowingly make, or cause to be made false, fictitious, fraudulent or misleading statements of material fact in, or knowingly did omit material facts from, or knowingly did cause material facts to be omitted from, any records, bills, claims or other document, in writing, electronically or in any other form that a person attempted to submit, submitted, caused to be submitted or attempted to cause to be submitted to various insurance carriers, to wit: Allstate, American National Fire, Amica Mutual, Arbella Mutual, Clarendon, CNA, Colonial Penn, Eagle, MDA, Elco, Fidelity & Guarantee, First Trenton, General Accident, Great American, GSA, Hanover, IFA,

Keystone, Liberty Mutual, National Continental, NCIC, Newark Insurance Company, New Jersey Manufacturers, Ohio Casualty, Progressive, Prudential, Selective, Sentry, State Farm, USAA, and Victoria Insurance Company, for payment or reimbursement for health care services, contrary to the provisions of N.J.S.A. 2C:21-4.3a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Theft by Deception - Second degree)

LITSA TSILIONIS, D.C.

and

GEORGE TSILIONIS, D.C.

between on or about July 1, 1996 and on or about March 31, 1999, at the City of East Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposely obtain or attempt to obtain property of another in excess of \$75,000 by deception, that is, the said LITSA TSILIONIS and GEORGE TSILIONIS, doing business as Allied Trauma and Health Care, Inc., did purposely obtain or attempt to obtain in excess of \$75,000 from various insurance carriers, to wit: Allstate, American National Fire, Amica Mutual, Arbella Mutual, Clarendon, CNA, Colonial Penn, Eagle, MDA, Elco, Fidelity & Guarantee, First Trenton, General Accident, Great American, GSA, Hanover, IFA, Keystone, Liberty Mutual, National Continental, NCIC, Newark Insurance Company, New Jersey Manufacturers, Ohio Casualty, Progressive, Prudential, Selective, Sentry, State Farm, USAA, and Victoria Insurance Company, by creating or reinforcing the false impression that the bills submitted by Allied Trauma and Health Care Center, Inc. for payment or reimbursement for health care services accurately reflected the services provided to its patients.

WHEREAS, IN TRUTH AND IN FACT, as the said LITSA TSILIONIS, and GEORGE TSILIONIS well knew, the bills submitted by Allied Trauma and Health Care Center, Inc. for payment or reimbursement for health care services did not accurately reflect the services provided to its patients, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:5-1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Misconduct by Corporate Official - Second Degree)

LITSA TSILIONIS, D.C.

and

GEORGE TSILIONIS, D.C.

between on or about July 1, 1996 and on or about March 31, 1999, at the City of East Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did use, control or operate a corporation for the furtherance or promotion of a criminal object, thereby deriving a benefit of \$75,000.00 or more, that is the said LITSA TSILIONIS and GEORGE TSILIONIS did use, control or operate ALLIED TRAUMA AND HEALTH CARE, INC., and/or ACCUTEST MOBILE DIAGNOSTICS GROUP, INC., corporations of the State of New Jersey for the furtherance or promotion of the criminal objects of Health Care Claims Fraud, in violation of N.J.S.A. 2C:21-4.3, Theft by Deception, in violation of N.J.S.A. 2C:20-4, and Financial Facilitation of Criminal Activity in violation of N.J.S.A. 2C:21-25a, contrary to the provisions of N.J.S.A. 2C:21-9c and N.J.S.A. 2C:2-6,, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Health Care Claims Fraud - Second degree)

CARL LOVE, JR.

and

RAJAUHN SHARRIEFF

who were not practitioners, between on or about June 25, 1998 and on or about December 1, 1998, at the City of East Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, doing business as Essex Shuttle, Inc., knowingly did commit five or more acts of Health Care Claims Fraud, in that the said CARL LOVE, JR. and RAJAUHN SHARRIEFF did knowingly make, or cause to be made five or more false, fictitious, fraudulent or misleading statements of material fact in, or knowingly did omit five or more material facts from, or knowingly did cause five or more material facts to be omitted from, any records, bills, claims or other document, in writing, electronically or in any other form that a person attempted to submit, submitted, caused to be submitted or attempted to cause to be submitted to various insurance carriers, to wit: Allstate, Clarendon, MDA, Prudential, Selective and State Farm, for payment or reimbursement for health care services, and the aggregate pecuniary benefit obtained or sought to be obtained was at least \$1,000, contrary to the provisions of N.J.S.A. 2C:21-4.3c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of

COUNT SEVEN

(Attempted Theft by Deception - Third Degree)

CARL LOVE, JR.

and

RAJAUHN SHARRIEFF

between on or about June 25, 1998 and on or about December 1, 1998, at the City of East Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposely obtain or attempt to obtain property of another in excess of \$500.00 by deception, that is, the said CARL LOVE, JR. and RAJAUHN SHARRIEFF, doing business as Essex Shuttle, Inc., did purposely obtain or attempt to obtain in excess of \$500.00 from various insurance carriers, to wit: Allstate, Clarendon, MDA, Prudential, Selective and State Farm, by creating or reinforcing the false impression that the bills submitted by Essex Shuttle, Inc. for payment or reimbursement for transportation services provided to patients of Allied Trauma and Health Care, Inc., accurately reflected the services provided,

WHEREAS, IN TRUTH AND IN FACT, as the said CARL LOVE JR., and RAJAUHN SHARRIEFF well knew, the bills submitted by Essex Shuttle, Inc., for payment or reimbursement for transportation services provided to patients of Allied Trauma and Health Care, Inc., did not accurately reflect the services provided, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:5-1 and

N.J.S.A. 2C:2-6, and against the peace of this State, the
government and dignity of the same.

COUNT EIGHT

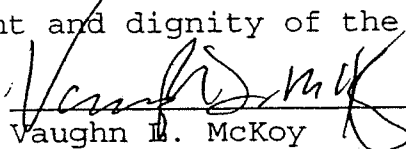
(Misconduct by Corporate Official - Second Degree)

CARL LOVE, JR.

and

RAJAUHN SHARRIEFF

between on or about August 29, 1997 and on or about March 31, 1999, at the City of East Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did use, control or operate a corporation for the furtherance or promotion of a criminal object, thereby deriving a benefit of \$75,000.00 or more, that is the said CARL LOVE, JR. and RAJAUHN SHARRIEFF did use, control or operate ESSEX SHUTTLE, INC., a corporation of the State of New Jersey for the furtherance or promotion of the criminal objects of Health Care Claims Fraud, in violation of N.J.S.A. 2C:21-4.3, and Theft by Deception, in violation of N.J.S.A. 2C:20-4, by and along with LITSA TSILIONIS and GEORGE TSILIONIS, doing business as Allied Trauma and Health Care, Inc., contrary to the provisions of N.J.S.A. 2C:21-9c and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.


Vaughn M. McKoy
Director
Division of Criminal Justice

A TRUE BILL:



, Foreperson

Dated: 4/17/03